REMARKS

Claims 1-37 are pending in the application and stand rejected. Applicant requests reconsideration of the claim rejections based on the above amendments and following remarks.

Claims 1-15 and 19-37 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,119,147 to Hashimoto and claims 16-18 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hashimoto in view of U.S. Patent No. 6,119, 147 to Toomey. It is respectfully submitted that all pending claims are patentable over the cited art of record.

More specifically, Applicant respectfully submits that at the very minimum, claims 1, 19 and 29 are patentable and non-obvious over Hashimoto. For instance, Hashimoto does not disclose or suggest, e.g., *a **multi-modal application** comprising at least **a first mode process** that enables user interaction with the application in a first modality and **a second mode process** that enables user interaction with the application in a second modality.* as commonly recited in claims 1, 19 and 29.

Hashimoto discloses in FIGs. 1 and 56, for example, a speech recognition system (1, 1A) that provides speech recognition functions for a plurality of applications (2) through a MPU unit (11). In this regard, the combination of the speech recognition system (1, 1A) and any application (20) does not constitute a "multi-modal application" as contemplated by the claimed inventions. Indeed, the speech recognition unit (1, 1A) is not a speech mode process of the application in the sense that the speech system (1, 1A) describes the speech interaction (speech mode process) with an application (2). In contrast, the speech recognition system (1A) merely provides an interface for processing audio signals (speech input) on behalf of the applications.

In fact, Hashimoto discloses (Col. 12, lines 47-50) that the speech system (1) is a server and the applications (2) are clients of the speech recognitions system (1). In other words, the speech systems (1) and (1A) are merely speech servers that provide speech recognition functions

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to the applications (2).   Further, <u>Hashimoto</u> discloses (FIG. 11) that the applications (2)

comprise a program (2) that executes its own processing depending on its applications, which

contains the procedures and commands for processing recognition results obtained from the

speech recognition system (1). **(See, Col. 12, lines 11-29).**   In other words, <u>the speech</u>

<u>recognition systems (1) or (1A) are not speech mode processes of a multi-modal application that</u>

<u>execute the speech commands on behalf of a multi-modal application.</u>

Furthermore, in this regard, <u>Hashimoto</u> does not disclose or suggest *synchronized multi-*

modal interaction with the multi-modal application wherein user interaction in one modality

results in execution of corresponding commands in both the first and second mode processes, as

essentially claimed in claims 1, or *triggering an action by the firs mode process based on the*

received command or event and triggering a corresponding action by the second mode process,

as recited in claims 19 and 29.

Indeed, to the extent that the speech recognition system (1, 1A) is deemed a mode

process of a multi-modal application, for the reasons explained above, <u>the speech recognition</u>

<u>systems (1, 1A) do not execute the speech commands for a multi-modal application</u> – the speech

recognition systems (1, 1A) merely perform recognition of speech input on behalf of the

applications (2) and the applications (2) actually execute the recognized commands.

Furthermore, to the extent that each application (2) is deemed a *multi-modal application*,

<u>Hashimoto</u> does not disclose a synchronized interaction wherein corresponding commands in a

plurality of mode processes of the application (2) are executed in response to a user command

input in one interaction modality. Indeed, <u>Hashimoto</u> does not provide details on the

programming structure or specification of the applications (2).

Furthermore, the MPU units (11) clearly are not multi-modal shells that manage the synchronization between different mode processes of an application (2). The MPU (11) merely provides means for exchanging messages between the speech recognition system (1, 1A) and the applications (2) to provide an interface for the server/client communication.

Accordingly, claims 1, 19 and 29 are believed to be patently distinct and patentable over Hashimoto. Furthermore, claims that depend from claims 1, 19 and 29 are patentable over Hashimoto as at least for the same reasons given for respective base claims 1, 19 and 29.

Further, with respect to the rejection of claim 16-18 based on the combination of Hashimoto and Toomey, such combination is believed to be legally deficient at least to the extent that Hashimoto does not disclose or suggest the inventions of claim 1, from which claims 16-18 depend. Furthermore, Toomey is distinguishable from the claimed inventions at least for the reasons previously cited by Applicant. Therefore, withdrawal of the obviousness rejections is respectfully requested.

Respectfully submitted,

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